

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ROBERT STOUD,	:	
	:	
Plaintiff	:	CIVIL ACTION - LAW
	:	
v.	:	
	:	
SUSQUEHANNA COUNTY,	:	NO. 3:17-CV-2183-MEM
	:	
Defendant	:	

MOTION OF DEFENDANT, SUSQUEHANNA COUNTY, FOR SUMMARY
JUDGMENT

Defendant, Susquehanna County, through its attorneys, Kreder Brooks Hailstone LLP, pursuant to Federal Rule of Civil Procedure 56, hereby moves for Summary Judgment and cites the following reasons therefore:

1. This is an action to recover damages for alleged violations of Plaintiff's constitutional rights under Title VII of the Civil Rights Act of 1964 and the Pennsylvania Human Relations Act (PHRA).
2. Plaintiff alleges that at all times materially relevant to his claim he was employed as Chief Clerk of Susquehanna County.

3. Plaintiff alleges that he was subjected to a hostile work environment in retaliation for investigating an incident of sexual harassment.
4. In order to prove a hostile work environment, Plaintiff must show, by a totality of circumstances, the existence of a hostile or abusive environment which is severe enough to affect the psychological stability of an employee.
5. Additionally, plaintiff must provide evidence that the hostile work environment was in retaliation for his investigation of an incident of sexual harassment.
6. Plaintiff has presented no evidence of a hostile or abusive work environment, nor has he provided any evidence that the actions he complains of were in retaliation for investigation a sexual harassment incident.
7. There is no dispute as to the material facts and Defendant, Susquehanna County, is entitled to Judgment as a matter of law.

WHEREFORE, it is respectfully requested that Plaintiff's Complaint against the Defendant, Susquehanna County, be dismissed.

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BY: /s/A. James Hailstone

A. James Hailstone
Attorney I.D. #80055
Attorneys for Defendant,
Susquehanna County

CERTIFICATE OF SERVICE

AND NOW, this 29th day of November, 2018, A. James Hailstone, a member of the firm of Kreder Brooks Hailstone LLP, electronically filed the foregoing Motion for Summary Judgment with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address(es):

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